



308176

TSD RCRA Inspection Report

EPA Identification Number: 1 N D 0 4 7 0 3 0 2 2 6 -Installation Name: U.S.S. Lead Refinery, Inc.Location Address: 5300 Kennedy AvenueCity: East Chicago ZIP 46312Date of Inspection: 9/29/85 Time of Inspection 9:30 A

Person(s) interviewed *

Title

Telephone

Ronald E. GoldenMan. of Production219/397-1012

Inspector(s)

Agency

Telephone

Ted WarnerESBH317/243-5111* Please identify correspondence contact

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input checked="" type="checkbox"/> Container storage	S02 <input type="checkbox"/> Tank storage
S03 <input checked="" type="checkbox"/> Waste Pile storage	S04 <input type="checkbox"/> Surface impoundment storage
D79 <input type="checkbox"/> Injection well disposal	D80 <input type="checkbox"/> Landfill disposal
D81 <input type="checkbox"/> Land Application disposal	D83 <input type="checkbox"/> Surface Impoundment disposal
T01 <input checked="" type="checkbox"/> Tank Treatment	T02 <input type="checkbox"/> Surface Impoundment treatment
T03 <input type="checkbox"/> Incinerator treatment	T04 <input type="checkbox"/> Other

If Part A process codes are listed above as T04 please describe the process involved below.

Other activitiesGenerator ☒

Appendix GN

Transporter ☐

Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Reference #10

Reference #10

01

6. Hazardous Waste

<u>On-Site</u>	<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
K069 - Dust	1800 Tons	Waste Pile	Inside Building
D008 - rubber chips	over 20 cys/bk.	open box	spilled around box
D008 - calcium sulfate		Waste Pile	- Photographs

7. Is the Annual Report Accurate? yes

8. List Transporters Used by the Company

9. Non-Hazardous

Waste StreamsSourceRateDisposition

Company claims the calcium sulfate is no longer hazardous for land. This reduction in lead levels is due to the installation of 15,000 gal. fiberglass settling tank.

Can the Company Document Questionable Waste Streams are Non-Hazardous as Claimed? not produced

10. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

- * Possible dumping of hazardous waste in a wetland. Our office needs the final results from Ecology and Environment Inc.'s sampling done at U.S.S. Lead on March 13, 1984. Mr. Clarence Biege is E. & E. contact.

11. Additional Comments

The Company stopped receiving batteries in July of 1985. The last week in July was the last operation of the Battery Breaker. All operation are to stop by October 18, 1985.

The waste pile building is in very poor condition.

1. Broken and missing windows.
2. Roof missing in several areas.
3. Base of storage area can not be inspected due to the build up of bag house dust.

YES NO NI

- c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c) (320 IAC 4.1-16-4)

— — N/A

3) Owner or Operator Inspections:

- * a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
40 CFR 265.15(a) (320 IAC 4.1-16-6)
- b. Does the owner or operator have an inspection schedule at the facility?
40 CFR 265.15(b)2 (320 IAC 4.1-16-6)
- c. If so, does the schedule address the inspection of the following items:
40 CFR 265.15(b)1 (320 IAC 4.1-16-6)
- i. monitoring equipment?
- ii. safety and emergency equipment?
- iii. security devices (including fences)?
- iv. operating and structural equipment (ie. dikes, pumps, etc.)?
- v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?
40 CFR 265.15(b)(2) (320 IAC 4.1-16-6)
- vi. inspection frequency (based upon the possible deterioration rate of the equipment)?
40 CFR 265.15(b)(4) (320 IAC 4.1-16-6)

— X —

— X —

— X —

— X —

— X —

— X —

— X —

— X —

No inspection schedule and no formal inspection program

YES NO NI

vii. Must include:

- | | | | | |
|----|--|---|---|-----|
| 1. | Weekly container storage?
(See 265.174) (320 IAC 4.1-23-5) | — | — | N/A |
| 2. | Daily and Weekly Tank Storage?
(See 265.194) (320 IAC 4.1-24-4) | — | X | — |
| 3. | Daily freeboard and weekly dike inspection
for surface impoundments?
(See 265.226) (320 IAC 4.1-25-5) | — | — | N/A |
| 4. | Landfills, Thermal treatment, Chemical,
Physical, and Biological treatment should
be inspected as determined by deterioration
rate and daily at loading and unloading
areas (where spills are likely)
[See 265.15(b)(4) (320 IAC 4.1-16-6)] | — | — | N/A |
| d. | Does Owner or Operator follow the written inspection
schedule as outlined?
265.15(b)(1) (320 IAC 4.1-16-6) | — | — | N/A |
| e. | Are areas subject to spills inspected
daily when in use?
265.15(b)(4) (320 IAC 4.1-16-6) | — | X | — |

- | | | | | |
|------|--|---|---|---|
| f. | Does the owner or operator maintain an inspection
log or summary of owner or operator inspections?
40 CFR 265.15(d) (320 IAC 4.1-16-6) | — | X | — |
| g. | Does the inspection log contain the following information:
40 CFR 265.15(d) (320 IAC 4.1-16-6) | — | ↓ | — |
| i. | the date and time of the inspection? | — | — | — |
| ii. | the name of the inspector? | — | — | — |
| iii. | a notation of the observations made? | — | — | — |
| iv. | the date and nature of any repairs or remedial
actions? | — | ↓ | — |

YES NO NI

4) Do personnel training records include:

- a. Job titles for the positions related to HWM
40 CFR 265.16(d)1 (320 IAC 4.1-16-7) X — —
- b. The name of the employees filling each job title?
40 CFR 265.16(d)(1) (320 IAC 4.1-16-7) X — —
- c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
40 CFR 265.16(d)2 (320 IAC 4.1-16-7) ☒ X —
- d. Description of both introductory and continuing training required for each job?
40 CFR 265.16(d)(3) (320 IAC 4.1-16-7) X — —
- e. Records of training required in (d)?
40 CFR 265.16(d)4 (320 IAC 4.1-16-7) X — —
- f. Did facility personnel receive the required training including:
- i) classroom or on the job X — —
- ii) within 6 months of hire X — —
- iii) annual review of training? X — —
- g. Are all training records maintained for current personnel and for at least three years for former employees?
40 CFR 265.16(e) [320 IAC 4.1-16-7(e)] X — —

4) c.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 (4.1-18-2) and 265.56 (4.1-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 265.37 (4.1-17-7)?

c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
40 CFR 265.52(e) (320 IAC 4.1-18-3)

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)
40 CFR 265.52(f) (320 IAC 4.1-18-3)

2) Emergency Coordinator:

a. Is the facility Emergency Coordinator identified?
40 CFR 265.52(d) (320 IAC 4.1-18-3)

b. Is coordinator familiar with all aspects of site operation and emergency procedures?
40 CFR 265.55 (320 IAC 4.1-18-6)

c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
40 CFR 265.55 (320 IAC 4.1-18-6)

No formal Contingency Plan

Preparedness and Prevention

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

40 CFR 265.37 (320 IAC 4.1-17-7)

— X —

- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?

40 CFR 265.53 (320 IAC 4.1-18-4)

— — N/A

- 3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (320 IAC 4.1-18-7)?

— — N/A

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

- 4) Use of Manifest System:

- a. Does the facility follow the procedures listed in 265.71 (4.1-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

— — — N/A

- b. Are records of past shipments retained for 3 years? 40 CFR 265.71(b)5 (320 IAC 4.1-19-2)

— — —

- 5) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only)

40 CFR 265.72 (320 IAC 4.1-19-3)

— — —

	<u>YES</u>	<u>NO</u>	<u>NI</u>
3) Operating Record:			
a. Does owner or operator have a operating record? <u>40 CFR 265.73(a)</u>	<u>X</u>	—	—
b. Does the owner or operator maintain an operating record that contains the following information?			
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (320 IAC 4.1-32-2)? <u>40 CFR 265.73(b)(1) (320 IAC 4.1-19-4)</u>	<u>X</u>	—	—
ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) <u>40 CFR 265.73(b)(2) (320 IAC 4.1-19-4)</u>	<u>X</u>	—	—
iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) <u>40 CFR 265.73(b)(2) (320 IAC 4.1-19-4)</u>	<u>\</u>	—	<u>N/A</u>
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? <u>40 CFR 265.73(b)(3)(5)(6) (320 IAC 4.1-19-4)</u>	<u>X</u>	—	—
v. Reports detailing all incidents that required implementation of the Contingency Plan? <u>40 CFR 265.73(b)(4) (320 IAC 4.1-19-4)</u>	—	—	<u>N/A</u>
vi. All closure and post closure costs as applicable? <u>40 CFR 265.73(b)(7) (320 IAC 4.1-19-4)</u>	<u>X</u>	—	—

YES NO NI

4) Unmanifested Waste Reports:
(applies only to Off-site facilities)

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (4.1-8-1) without a manifest or shipping paper? 40 CFR 265.76 (320 IAC 4.1-19-7) N/A
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.
- c. Has the facility submitted 8700-13B (unmanifested waste report)?
- _____
- _____
- _____

6) Closure/Post-Closure:

- a. Is the closure plan available for inspection?
40 CFR 265.112(a) (320 IAC 4.1-21-3)
- b. Is the post-closure plan available for inspection? N/A
(for disposal facilities only)
40 CFR 265.118(a) (320 IAC 4.1-21-8)
- _____
- _____
- _____

PHYSICAL FACILITY INSPECTION

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 (320 IAC 4.1-16-5) for the following

	<u>YES</u>	<u>NO</u>	<u>NI</u>
a. 24- hour surveillance? or	<u>X</u>	—	—
b. i. Artificial or natural barrier around facility? and	<u>X</u>	—	—
ii. Controlled entry?	<u>X</u>	—	—
c. Danger sign(s) at entrance?	—	<u>X</u>	—

Preparedness and Prevention:

Part 265 Subpart C

- 2) Maintenance and Operation of Facility

a. Is there any evidence of fire, explosion, or release
of hazardous waste or hazardous waste constituent? X — —
40 CFR 265.31 (320 IAC 4.1-17-2)

- 3) If required, does the facility have
the following equipment:

a. Internal communications or alarm systems? X — —
40 CFR 265.32(a) & 40 CFR 265.34(a) (320 IAC 4.1-17-3 & 5)

b. Telephone or 2-way radios at the scene of operations? — X —
40 CFR 265.32(b) & 40 CFR 265.34(b) (320 IAC 4.1-17-3 & 5)

c. Portable fire extinguishers, fire control, spill
control equipment and decontamination equipment? X — —
40 CFR 265.32(c) [320 IAC 4.1-17-3(c)]

d. Are water hoses, foam equipment, automatic sprinklers
or water spray equipment available? — — N/A
40 CFR 265.32(d) [320 IAC 4.1-17-3(d)]

city water

YES NO NI

) Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33 (320 IAC 4.1-17-4)

X — —

- b. Is emergency equipment maintained in operable condition?
40 CFR 265.33 (320 IAC 4.1-17-4)

X — —

- 4) Has owner or operator provided immediate access to internal alarms? (If needed)
40 CFR 265.34(a) (320 IAC 4.1-17-5)

X — —

- 5) Does the owner or operator maintain adequate aisle space for inspections, movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

40 CFR 265.35 (320 IAC 4.1-17-6)

X — —

Tanks

40 CFR 265 Subpart J

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|------------|
| 1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?
<u>40 CFR 265.192(b) (320 IAC 4.1-24-2)</u> | <u>X</u> | — | — |
| 2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
<u>40 CFR 265.192(c) (320 IAC 4.1-24-2)</u> | <u>X</u> | — | — |
| 3) Do continuous feed systems have a waste-feed cut-off?
<u>40 CFR 265.192(d) (320 IAC 4.1-24-2)</u> | <u>X</u> | — | — |
| 4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable?
Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
<u>40 CFR 265.198 (320 IAC 4.1-24-6)</u> | — | — | <u>N/A</u> |
| 5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
<u>40 CFR 265.198(b) (320 IAC 4.1-24-6)</u> | | | |
| Tank capacity: <u>15,000</u> gallons <u>2,3000</u> | | | |
| Tank diameter: _____ feet | | | |
| Distance of tank from property line <u>over 100</u> feet | | | |
| (See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code -1977" to determine compliance.) | | | |
| 6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
<u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u> | | | |
| a. Special handling? | — | — | <u>N/A</u> |
| b. No Smoking signs? | — | — | <u>f</u> |
| c. Separation and protection from ignition sources? | — | — | <u>✓</u> |
-
-
-

GROUNDWATER MONITORING

N/A

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|---|------------|-----------|-----------|
| 1) Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) (320 IAC 4.1-20-1)</u> | — | <u>X</u> | — |
| 2) Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (320 IAC 4.1-20-1)</u> ? | — | <u>X</u> | — |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	<u>YES</u>	<u>NO</u>	<u>NI</u>
<u>Manifest Requirements:</u>			
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (320 IAC 4.1-10-1)	<u>X</u>	—	—
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period			—
3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 40 CFR 262.21 (320 IAC 4.1-8-1)			
a. Manifest document number? (A sequential number for all manifests before September 20, 1984 and a five digit unique number after September 20, 1984.)	<u>X</u>	—	—
b. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>	—	—
c. Name, telephone number (4.1-14-3) and EPA ID Number of Transporter(s)?	<u>X</u>	—	—
d. Name, Address, telephone number (4.1-14-3) and EPA ID Number of designated permitted facility?	<u>X</u>	—	—
e. The description of the waste(s)(DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—
g. Required certification?	<u>X</u>	—	—
h. Required signatures?	<u>X</u>	—	—
i. EPA hazardous waste number (4.1-14-3)?	<u>X</u>	—	—
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YES NO NI

4) Reportable exceptions:

40 CFR 262.42 (320 IAC 4.1-10-3)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. None

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (320 IAC 4.1-10-3) to the Regional Administrator.

5) If required, are placards available to transporters of hazardous waste?

40 CFR 262.33 (320 IAC 4.1-9-4)

X — —

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? — — N/A

40 CFR 262.50 (320 IAC 4.1-11-1)

(If answered Yes, complete the following as applicable.)

a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing? — — —

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? — — —

iii. Met the Manifest requirements? — — —

b. Importing hazardous waste; has the generator met the manifest requirements? — — —

PRE-TRANSPORT REQUIREMENTS:

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 1) Is waste packaged in accordance with DOT regulations?
(required prior to movement of hazardous waste off-site)
<u>40 CFR 262.30 (320 IAC 4.1-9-1)</u> | — | — | <u>X</u> |
| 2) Are waste packages marked and labeled in accordance with
DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site)
<u>40 CFR 262.31-261.32 (320 IAC 4.1-9-2 & 3)</u> | — | — | <u>X</u> |
-
-
-

3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b) (320 IAC 4.1-15-1)] or (B) in accordance with 40 CFR 262.34 (320 IAC 4.1-9-5) [see 265.1(c)(7) (320 IAC 4.1-15-1)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank X and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

- | | | | |
|---|---|---|---|
| a. Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| b. Are <u>all</u> containers visible for inspection?
<u>40 CFR 262.34(a)(2) (320 IAC 4.1-9-5)</u> | — | — | — |
| c. Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| d. Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| e. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
-
-
-
-

YES NO NI

RECORDKEEPING AND REPORTING:

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
40 CFR 262.11 (320 IAC 4.1-7-2) — — — ?
- 2) Have all all test results and analyses needed for hazardous waste determination been done? Are they retained on-site for at least three years?
40 CFR 262.11 (4.1-7-2) & 40 CFR 262.40 (4.1-7-2) — — — ?
- 3) Has the generator submitted biennial reports and exception reports as required?
320 IAC 4.1-10-2 and 320 IAC 4.1-10-3 X — —
- 4) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
40 CFR 262.40 (320 IAC 4.1-10-1) X — —

1) Calcium sulfate results are not yet available.
